

Jonathan Schwalb, Esq.  
Friedman Vartolo LLP  
85 Broad Street, Suite 501  
New York, New York 10004  
Attorneys for Planet Home Lending as servicer for  
Wilmington Trust National Association, not in its  
individual capacity but solely in its capacity as Trustee of  
MFRA Trust 2014-2  
P: (212) 471-5100  
[Bankruptcy@FriedmanVartolo.com](mailto:Bankruptcy@FriedmanVartolo.com)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

IN RE:

Jeanne A. Griscom aka Jeanne Anne Griscom

Debtor

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:

: CASE NO.: 18-34133-JNP

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: CHAPTER: 13

:

: HON. JUDGE.:

: Jerrold N. Poslusny Jr.

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: HEARING DATE:

: November 23, 2021 at 11:00AM

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**LIMITED OPPOSITION TO DEBTOR'S MOTION TO SELL REAL PROPERTY**

Jonathan Schwalb, an attorney admitted to practice before the United States Bankruptcy Court for the District of New Jersey, hereby affirms the following to be true under the penalty of perjury:

1. Planet Home Lending, LLC as Servicer for Wilmington Trust National Association, not in its individual capacity but solely in its capacity as Trustee of MFRA Trust 2014-2 (hereinafter "Secured Creditor"), by and through its attorneys, Friedman Vartolo LLP, submits this affirmation in response to the motion Jeanne A. Griscom aka Jeanne Anne Griscom (hereinafter "Debtor"), dated October 25, 2021, seeking to sell the real property located at 228 Bladwin Road, Borough of Glassboro, NJ 08028 (hereinafter "Property").

2. The Debtor filed a Chapter 13 Bankruptcy Petition on December 7, 2018.
3. The Secured Creditor is a lien holder of the Debtor. This debt is evidenced by a Proof of Claim, filed on the Court's Claim Register as claim number 2-1 (hereinafter "Proof of Claim") which detailed a total debt at the time of filing in the amount of \$102,100.50.
4. The Debtor's Motion now seeks court approval to sell the Property for the sum of \$172,000.00.
5. The Motion relies on an outdated payoff as the amount owed to Secured Creditor. This does not accurately reflect the current payoff figure and should not be relied upon at closing.
6. Secured Creditor does not object to the sale of the Property, however Secured Creditor submits this limited response seeking assurance that any Order granting the Motion includes a provision which states that Secured Creditor will be paid in full on the closing date from a payoff which will be provided at closing.
7. Secured Creditor also requests that adequate protection payments be made pending the closing.
8. Secured Creditor also requests that any Order granting the Motion confirm that Secured Creditor's Proof of Claim will no longer receive any payments from the Chapter 13 Trustee under the Chapter 13 Plan as the loan will be paid in full at closing.

**WHEREFORE**, Secured Creditor respectfully requests that the Debtor's Motion be granted to the extent outlined above and for all other and further relief as is just and proper.

Dated: New York, NY  
November 2, 2021

By: /s/ Jonathan Schwalb  
Jonathan Schwalb, Esq.  
FRIEDMAN VARTOLO LLP  
Attorneys for Planet Home Lending as servicer  
for Wilmington Trust National Association, not  
in its individual capacity but solely in its  
capacity as Trustee of MFRA Trust 2014-2  
85 Broad Street, Suite 501  
New York, New York 10004  
T: (212) 471-5100  
F: (212) 471-5150

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Jonathan Schwalb, Esq.  
Friedman Vartolo LLP  
85 Broad Street, Suite 501  
New York, New York 10004  
P: (212) 471-5100  
Planet Home Lending as servicer for  
Wilmington Trust National Association, not in  
its individual capacity but solely in its capacity as  
Trustee of MFRA Trust 2014-2

**In Re:**

Jeanne A. Griscom  
aka Jeanne Anne Griscom

Case No.: 18-34133-JNP

Chapter: 13

Adv. No.: \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Hon. Judge: Jerrold N. Poslusny Jr.

**CERTIFICATION OF SERVICE**

1. I, Katie Crotteau :

☐ represent \_\_\_\_\_ in the this matter.

☒ am the secretary/paralegal for Jonathan Schwalb, Esq., who represents  
Planet Home Lending in the this matter.

☐ am the \_\_\_\_\_ in the this case and am representing myself.

2. On November 2, 2021, I sent a copy of the following pleadings and/or documents  
to the parties listed in the chart below.

Limited Opposition to Motion to Sell

3. I certify under penalty of perjury that the above documents were sent using the mode of service  
indicated.

Date: November 2, 2021

/s/Katie Crotteau  
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Jeanne A. Griscom aka Jeanne Anne Griscom 317 Dundee Drive Williamstown, NJ 08094	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Joseph J. Rogers Washington Professional Campus 900 Route 168 Suite I-4 Turnersville, NJ 08012	Debtor(s) Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)